

Exhibit 1

Page 1

1
2 UNITED STATES DISTRICT COURT
3 DISTRICT OF MASSACHUSETTS

4 -----
5 INA STEINER, DAVID STEINER, and STEINER
6 ASSOCIATES, LLC,

7 Plaintiffs,

8 -against-

9 EBAY INC., et al.,

10 Defendants.

11 Civil Action No. 21-CV-11181-PBS
12 -----

13 December 18, 2024
14 1:08 p.m.
15

16 VIDEOCONFERENCE DEPOSITION of
17 KRISTIN K. KUCSMA, taken by Defendants,
18 pursuant to Notice, held at 7 Pihlman
19 Place, Chatham, New Jersey before Wayne
20 Hock, a Notary Public of the State of New
21 York.
22
23
24
25

1 K. K. Kucsma

2 record.

3 The time is 6:11 p.m.

4 (Whereupon a break was taken)

5 THE VIDEOGRAPHER: Back on the
6 record.

7 The time is 6:22 p.m.

8 MR. NONAKA: Thank you.

9 So Ms. Kucsma, we're going to
10 adjourn the deposition for today to
11 resume at a later date.

12 One of the agreements that we
13 had reached with Mr. Fromson earlier
14 was that we would make as much
15 progress towards 7:00 today, and then
16 reserve remaining time to finish up at
17 a later date given, one, the late
18 start, plus the fact that this was
19 going to be in person and is no
20 longer.

21 I just wanted to say thank you.
22 We will coordinate with Mr. Fromson on
23 finding a mutually agreeable date.

24 THE WITNESS: Right.

25 And I really do appreciate

1 K. K. Kucsma
2 everybody's flexibility. And we will
3 certainly, you know, work with you
4 when you guys, you know, pick a new
5 date.

6 MR. NONAKA: Great. Thank you.

7 THE VIDEOGRAPHER: If it's okay
8 with counsel, I'll close out this
9 portion of today.

10 We're off the record at 6:23
11 p.m. EST.

12 There was four hours and
13 twenty-nine minutes of total record
14 time.

15 And this concludes today's
16 portion of the proceeding.

17 MR. NONAKA: So we just wanted
18 the record to reflect the agreement
19 that we reached with Mr. Fromson and
20 the plaintiffs.

21 So one, this deposition
22 originally was scheduled to be in
23 person and start at 9:00. Ms. Kucsma
24 was struck ill this morning, and so we
25 played by ear whether we could

1 K. K. Kucsma

2 continue. She was able to move
3 forward and we were able to start at
4 1:00 p.m. The agreement though was
5 that we would go no longer than until
6 7:00 and that whatever time remaining
7 on the seven-hour we would schedule
8 for another mutually agreeable date
9 and that would likely take place after
10 the discovery cutoff and may cause
11 delays in the deadlines for filing
12 Daubert motions. And so Mr. Fromson
13 has agreed that Plaintiffs would not
14 oppose a request to extend the
15 discovery cutoff just for the sole
16 purpose of finishing Ms. Kucsma's
17 deposition.

18 And to the extent that we needed
19 additional time because of that to
20 file any Daubert motions solely with
21 respect to Ms. Kucsma, that he would
22 not oppose any request to extend that
23 time.

24 Does that accurately reflect our
25 agreement?

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K. K. Kucsma

MR. FROMSON: Yes, it does.

Thank you.

MR. NONAKA: With that, I think
we're done. Thank you.

(TIME NOTED: 6:25 p.m.)

KRISTIN K. KUCSMA

Subscribed and sworn to before me
this ____ day of _____, 20__.

NOTARY PUBLIC